

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING FTX RECOVERY TRUST'S ONE HUNDRED FIFTIETH
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred fiftieth omnibus objection (the “Objection”)² of the FTX Recovery Trust³, for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

³ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to (a) the FTX Recovery Trust’s further objections on any substantive or non-substantive grounds and (b) any order with respect to any prior or subsequent objection to the “Surviving Claims” identified on Schedule 1 attached hereto.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust’s right to object on any other grounds that the FTX Recovery Trust discovers is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly

reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.

5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim

is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

0897: Sampling Class included in the class is not subject to the PTX Recovery Trust's One Hundred Fifty Percent Subordinated Debtor Obligations to Certain Unrelated Parties of Class Customer Claims.

Claim Number	Claims to be Disclosed										Surviving Claims			
	Name	Debtor	Tickers		Ticker Quantity	Claim Number	Name	Debtor	Tickers		Ticker Quantity			
98092	Name on file	FTX Trading Ltd.	AVAX		0.00001047946480	98379*	Name on file	FTX Trading Ltd.	SOL		8.0000000000000000			
			BNB		0.00000000584970				BNB		0.00000000584970			
			ETC		0.000000007004490				ETC		0.000000007004490			
			ETH		0.00000000341670				ETH		0.00000000341670			
			FTM		46.155.5197628670000				FTM		46.155.5197628670000			
			IMX		0.003154800000000				IMX		0.00000000725690			
		LUNA2	LUNA2		0.027881950000000				BNK		0.003154800000000			
		LUNC	LUNC		0.007984968304100				LUNA2		0.027882000000000			
		RAY	RAY		0.000000005413380				LUNC		0.007984968304100			
		RSR	RSR		0.00244398292132				RAY		0.000000005413380			
		RUNE	RUNE		0.000000003480950				RSR		0.002446398292132			
		SOL	SOL		0.000000006994778				RUNE		0.000000003480950			
		SUSHI	SUSHI		0.000000006189100				SOL		0.000000006994778			
		TRX	TRX		4.631.56390104197000				SUSHI		0.000000006189100			
		USDC	USDC		116.373.5100000000000				TLM		88.1750814734185000			
		USDT	USDT		0.005158729984394				TRX		4.631.56390104197000			
		XRP	XRP		0.000000008879660				USDC		116.373.510574732190000			
									USDT		0.005158729984394			
									XRP		0.000000008879660			
97534	Name on file	West Realm Shires Services Inc.			Undetermined*	97548	Name on file	West Realm Shires Services Inc.	USD		25.000.0000000000000000			
67734	Name on file	FTX Trading Ltd.	ATOM		119.587233510000000	98540	Name on file	FTX Trading Ltd.	ATOM		119.587233510000000			
			BNB		3.952326890000000				BNB		3.952326890000000			
66846	Name on file	Quoine Pte Ltd	SGD		250.000000000000000	98718	Name on file	Quoine Pte Ltd	ETC		6.0000000000000000			
									JPY		2.6600000000000000			
									SGD		14.2100000000000000			
77946	Name on file	West Realm Shires Services Inc.	DOG5		908.080000000000000	98369*	Name on file	FTX Trading Ltd.	Undetermined*					
			GRT		1.209000000000000									
			USD		356.060000000000000									
97508	Name on file	FTX Trading Ltd.			Undetermined*	97622	Name on file	West Realm Shires Services Inc.	ETC		0.110890043472411			
39589	Name on file	FTX Trading Ltd.	BULL		Undetermined*	98799	Name on file	FTX Trading Ltd.	ETC		0.279031361138545			

NESTOR: Sanctions Claim included as the claim to be modified subject to the PTC Recovery Trust's One Hundred Fifty Fourth (Non-Substantive) Obnoxious Objection to Certain Fully or Partially Unliquidated Proofs of Claim (Customer Claims)
NESTOR: Sanctions Claim included as the claim to be modified subject to the PTC Recovery Trust's One Hundred Fifty Fifth (Substantive) Obnoxious Objection to Certain Fully Unliquidated Proofs of Claim (Customer Claims) and the PTC Recovery Trust's One Hundred Fifty Second (Non-Substantive) Obnoxious Objection to Certain Inherited Debtors' Proofs of Claim (Customer Claims)
NESTOR: Includes claim contains unliquidated and/or unadmitted amounts